Exhibit I

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WONDERLAND NURSERYGOODS CO.,

LTD.,

Plaintiff,

vs.

No. 2:13-cv-00387

THORLEY INDUSTRIES (dba 4MOMS),)

Defendant.

)

DEPOSITION OF JERRY DROBINSKI

September 16, 2014

Tucson, Arizona

Reported by: ANTHONY C. GARCIA, RDR, CR Certified Reporter No. 50218

KATHY FINK & ASSOCIATES, INC. 2819 East 22nd Street Tucson, Arizona 85713 (520) 624-8644 Fax (520) 624-9336

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- 1 letter number, but all of them have exposed tubes. All
- 2 of them seem to have a fabric attachment that might be
- 3 similar to the claims of the patent. So, therefore --
- 4 and they all came out after they all entered the
- 5 marketplace, after the Wonderland product was sold
- 6 through Graco. So it was a fairly easy assumption that
- 7 they were copies in the marketplace.
- 8 It's very, very common in juvenile products
- 9 to have that happen.
- 10 Q. Is it your contention that the mere presence
- 11 of an exposed tube in these various products identified
- in Exhibit H means that those products infringed the
- 13 919 patent?
- 14 A. No, I didn't say that. I said the mere
- 15 presence of the exposed tube and what appears to be the
- 16 fabric attachment could indicate that they might
- infringe the patent, and because of their visual
- 18 appearance would have the same visual appearance or
- 19 visual attractiveness, if you will, of the 919 patent
- 20 product.
- 21 Q. Did you analyze any of the products
- 22 identified in Exhibit H of your report to determine
- 23 whether or not they infringe any claim of the 919
- 24 patent?
- 25 A. Trying to find the right one here.